

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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THOMAS M. COLE  
CLERK, U.S. DISTRICT COURT  
WD OF TN, MEMPHIS AC

Ruthie D. Grayson

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

Walgreens

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Ruthie D. Grayson  
(name of plaintiff)

is a citizen of the United States and resides at 635 Withers  
(street address)

Memphis United States Tennessee  
(city) (country) (state)

38104 901.220.9475  
(zip code) (telephone number)

3. Defendant Walgreens

(defendant's name)

lives at, or its business is located at

Memphis, TN 38104

(street address)

1359 Poplar Avenue

4. Plaintiff sought employment from the defendant or was employed by the defendant at

1130 S. Bellvue / 1359 Poplar Avenue

(street address)

Memphis  
(city)

United States  
(country)

TN  
(state)

38104 / 38104  
(zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about May 01 2011

(day)

(month)

(year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about N/A

(day)

(month)

(year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about May 23 2011

(day)

(month)

(year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 10 04 2011. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) X race, (2)    color, (3) X sex, (4)    religion, (5)    national origin, defendant and

(a)    failed to employ plaintiff.

(b) X terminated plaintiff's employment.

(c)    failed to promote plaintiff.

(d) Retaliation

10. The circumstances under which defendant discriminated against plaintiff were as follows: Plaintiff filed an internal complaint against a white male pharmacist after he referred to plaintiff as 'stupid, dumb, ignorant and something is wrong with her brain.' White male pharmacist also called plaintiff out of her name which was "Dammit". Defendant transferred plaintiff then terminated her employment after 30 days upon transfer. Plaintiff was discharged from employment based on "gross misconduct" after asking administrative assistant about her missing pay check. Plaintiff did not commit an act of gross misconduct. Company still allowed white male pharmacist to stay employed after committing an act of discrimination against plaintiff.

11. The acts set forth in paragraph 9 of this complaint

- (a) \_\_\_ are still being committed by defendant.  
 (b) \_\_\_ are no longer being committed by defendant.  
 (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) \_\_\_ Defendant be directed to employ plaintiff, or  
 (b) \_\_\_ Defendant be directed to re-employ plaintiff, or  
 (c) \_\_\_ Defendant be directed to promote plaintiff, or;  
 (d) ☒ Defendant be directed to Compensate plaintiff for both compensatory and punitive damages. Also give a formal apology for retaliation actions.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ( ☒ ) No ( )

Ruthie Graupner  
 SIGNATURE OF PLAINTIFF